Submitted Electronically via CDX Portal

January 14, 2022

Document Processing Desk Attn: Lindsay Roe, PM 22 Registration Division U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) 2777 South Crystal Drive Arlington, Virginia 22202-4501 WRA

Wagner Regulatory Associates, Inc.

Wagner Regulatory Associates, In P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Subject: Sharda Cropchem Ltd. – Pending Application

Pyraclostrobin Technical – 82633-LE

Change in method of support from Selective to Cite-All

Dear Ms. Roe:

On behalf of Sharda Cropchem Ltd., Wagner Regulatory Associates is amending the application for this product by submitting a revised data matrix. This revised matix supersedes all other data matrix previously submitted for this application. It changes Sharda's application from a selective method of support for generic data requirements to a cite-all method of support. And as required, Sharda is also sending a new, cite-all offer-to-pay letter to BASF.

The current PRIA renegotiated date for this application is March 28, 2022. The date was renegotiated due to the BASF petition to EPA regarding this application. With this change in the method of support to cite-all, the BASF petition now becomes mute as its arguments regarding the lack of citation of certain data are no longer valid. Given that the change to cite-all method eliminates the need for EPA to evaluate the petition, Sharda respectfully requests the Registration Division to expedite this pending application.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Sharda Cropchem Ltd. appointing Wagner Regulatory Associates, Inc. as its agent
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35) Internal and Public versions

Thank you in advance for your help with this request. Please contact me by email at jmw@wagnerreg.com or by phone at 302-635-7290 should you have any questions.

Respectfully submitted,

James M. Wagner

Agent for Sharda Cropchem Ltd.

Enclosures